

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Valerie Plame Wilson, et al.,)
)
Plaintiffs,)
)
v.) Civil No. 07 CV 4595 (BSJ)
)
J. Michael McConnell, et al.,)
)
Defendants.)
_____)

DECLARATION OF RICHARD J. PUHL
CHAIR, PUBLICATIONS REVIEW BOARD
CENTRAL INTELLIGENCE AGENCY

I, RICHARD J. PUHL, pursuant to 28 U.S.C. § 1746,
hereby declare:

1. I am the current Chair of the Publications Review Board (PRB) of the Central Intelligence Agency (CIA), and have served in this capacity since November 2005.
2. Through the exercise of my official duties, I am familiar with this civil action. I make the following statements based upon my personal knowledge and information made available to me in my official capacity.
3. The PRB is the body charged with reviewing materials submitted by current and former employees that are intended for nonofficial publication or public dissemination, to determine whether they contain classified information. Current and former employees are required to

submit such materials to the PRB for prepublication review pursuant to their signed CIA secrecy agreements. The purpose of the PRB's prepublication review is twofold: (a) to assist individuals in meeting their secrecy agreement obligations; and (b) to ensure that information damaging to the national security is not disclosed.

4. As Chair of the PRB, I am responsible for the review, coordination, and formal written approval of submissions in coordination with appropriate Board members. Upon completion of the review process, I send letters to those seeking prepublication review either formally approving the publication or delineating material inappropriate for public disclosure. I am familiar with the facts underlying the above captioned lawsuit through the exercise of my official duties.

5. The purpose of this declaration is to discuss the facts relating to the PRB's prepublication review of portions of the book written by Ms. Wilson's husband, Joseph Wilson. I provide these facts in response to assertions made by Plaintiffs regarding the U.S. Government's prepublication review of Mr. Wilson's book.

Specifically, Plaintiffs note a statement made by Ms. Wilson that Mr. Wilson restated on page 345 of his book.¹

6. Mr. Wilson did not submit the manuscript of his book directly to the CIA PRB for prepublication review. Mr. Wilson submitted his manuscript for prepublication review to the National Security Council (NSC). The NSC, in turn, sent certain portions of the book to the CIA PRB for its review.

7. Specifically, based on a review of our records, the NSC sent chapters 1, 2, and 7 of Mr. Wilson's book to the CIA PRB for review. The PRB requested redactions and changes to certain material in these three chapters. The final version of Mr. Wilson's book as it was published does not reflect all of the changes requested by the PRB to these portions of the book.

8. The PRB does not have a record of the NSC ever having referred chapter 17 to the CIA PRB for its review, nor do our records show that the PRB otherwise had the opportunity to review this chapter prior to publication of Mr. Wilson's book. Chapter 17 includes page 345 of Mr. Wilson's book, which contains the statement of Ms. Wilson quoted by Plaintiffs. The CIA PRB did not, therefore,

¹ Memorandum of Law of Valerie Plame Wilson and Simon & Schuster, Inc. in Support of Their Motion for Summary Judgment and for a Permanent Injunction at 4.

perform prepublication review of this statement or Mr. Wilson's book as a whole, with the exception of chapters 1, 2, and 7.

* * * *

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July, 2007.

R. Puhl

Richard J. Puhl
Chair, Publications Review Board
Central Intelligence Agency